

**SUBMITTING EVIDENCE TO A SCOTTISH PARLIAMENT COMMITTEE
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Date:	25 January 2019
Organisation: (if required)	Living Streets Scotland and Ramblers Scotland
Topic of submission:	Restricted Roads (20mph Speed Limits) Bill 2018

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RURAL ECONOMY AND CONNECTIVITY COMMITTEE
RESTRICTED ROADS (20 MPH SPEED LIMIT) (SCOTLAND) BILL
SUBMISSION FROM Living Streets Scotland and Ramblers Scotland

Introduction

Living Streets Scotland and Ramblers Scotland are national walking organisations that campaign for opportunities to enjoy streets and the outdoors, both for everyday journeys and leisure. Almost all journeys by foot will involve at least one section on a road with a restricted speed limit. We have come together on behalf of our members and supporters to express our support for more appropriate urban speed limits across Scotland. We believe the introduction of a national default speed limit of 20mph is the right approach to ensure consistency across the country. It will also be an important element in creating a change in culture and behaviour in terms of the way we view transport and use our urban areas.

Do you support the proposed reduction in the default speed limit on most urban and residential streets in Scotland from 30mph to 20mph?

Our organisations are strongly supportive of default 20mph limit being applied to urban areas throughout Scotland. This should cover all streets which are residential, used for shopping or bounded by public greenspaces.

The existing approach to creating 20mph streets by exception is back to front. Instead, 30mph limits should be the exception. Local authorities can take a strategic approach to retaining streets at 30mph where it is safe to do so, or where 20mph is impractical to enforce. The presence of houses, shops and parks should automatically signal to drivers that the speed limit is 20mph. Meanwhile, 30mph limits (or greater) could be applied to other areas, such as industrial areas and roads designed to accommodate higher speed traffic, for example multiple carriageways and fast distributor roads. In the case of those roads which will come under the default 20mph limit, it will be necessary to undertake some redesign (e.g. narrowing) or to install average speed cameras before implementing new 20mph limits. Therefore, changing the default isn't a blanket approach, given most authorities will retain a range of urban speed limits including 30mph.

It is already established that 20mph is the appropriate speed outside all schools in Scotland. However, these school gate zones account for only a small part of most children's overall school journeys. A more effective 0.5-mile (10 minutes' walk) cordon extending around Scotland's 2,031 primary schools would be greater or equivalent to the entirety of urban Scotland's road network. The only sensible way to achieve this is a default 20mph limit.

A 30 kmph speed limit (approximately 20mph) is increasingly seen as the norm for urban areas across Europe, so a lower default limit would be in line with other comparable countries. Meanwhile in Scotland, the position for road users is increasingly confused given that 20mph is the default in some but not all local authority areas. An inconsistent approach is confusing for drivers and makes education on speed more challenging.

Do you think reducing the default speed limit on most urban and residential streets would enhance road safety?

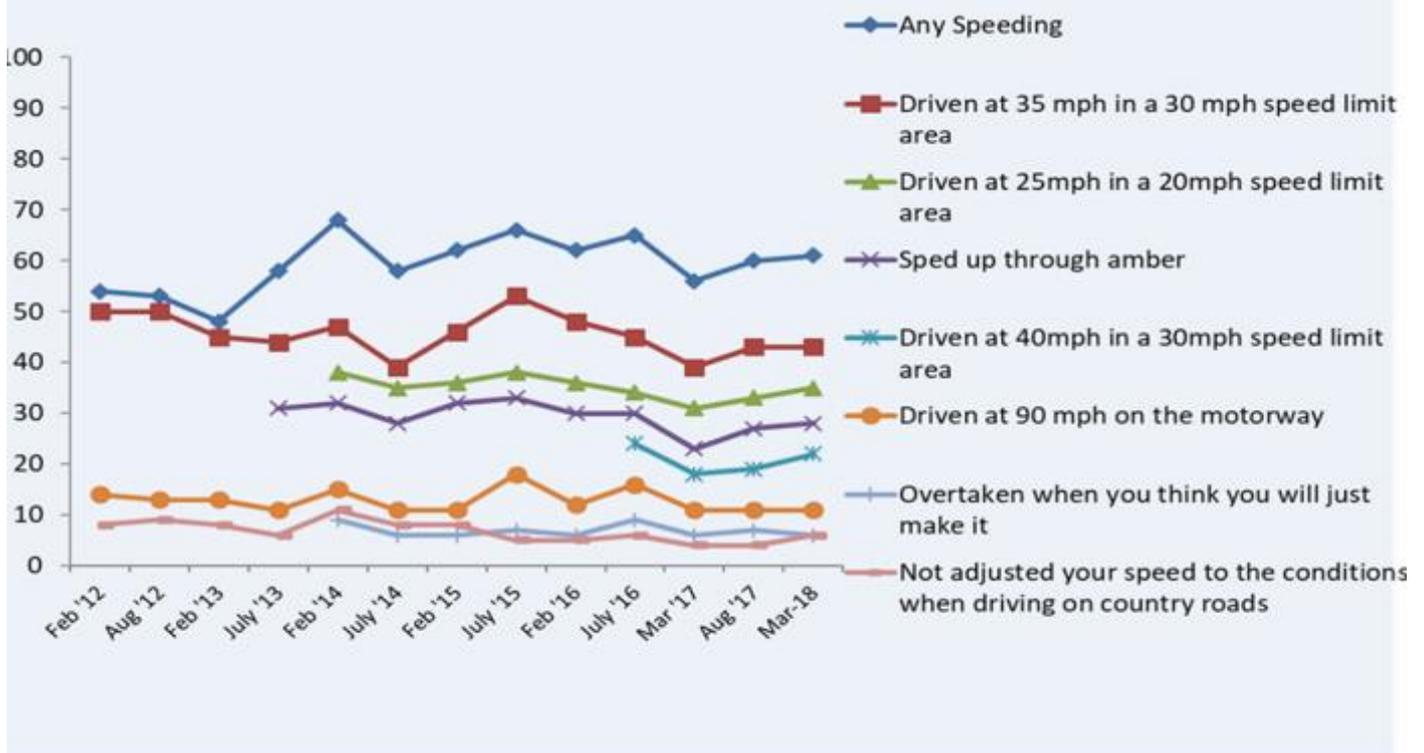
There is strong evidence to show that any reduction in average and maximum speeds in urban areas will save lives. Speed is the critical factor in relation to stopping distances and the amount of kinetic energy in a collision.

In 2010 The Department for Transport (DfT) looked at the relationship between speed and risk of fatal injury and found that the risk of fatal injury to pedestrians rose from under 1% at an impact speed of 20mph to 5.5%, or 1 in 20, at 30mph. Above 30mph risk increased very substantially, to over 30% or 1 in 3 casualties. Research has shown a fall of casualties of between 4% and 6% for each 1mph reduction in average speed¹.

Even small changes in driver behaviour will result in benefits, but the overall outcomes will relate to existing average speeds and compliance with the new limit. We aren't aware of a more cost-effective way of reducing casualties at a population level via a road safety intervention. Nor are there any downsides of changing a limit established in the 1930s to better reflect modern evidence on the relationship between speed and casualty levels.

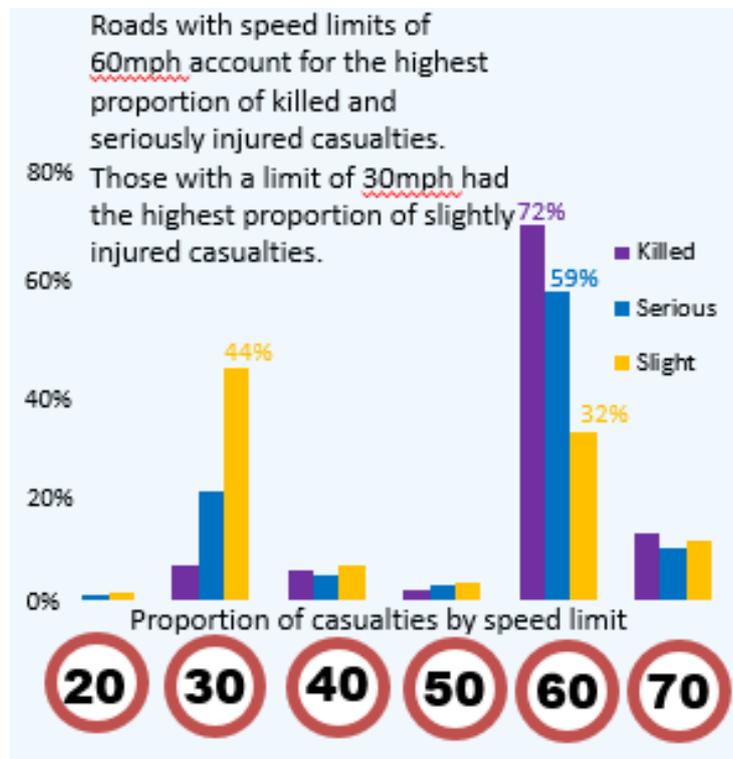
To secure the maximum benefits from 20mph it's important that drivers obey the limits consistently. Evidence from Scottish driver attitudes surveys shows that drivers claim to observe the speed limit more consistently than 30mph limits (See graph) but there is considerable room for improvement. But it may be more challenging to sustain this behaviour in a range of non-residential streets with higher design speeds without redesign or proactive enforcement. A [study by Atkins](#) for the Department for Transport covering England only, showed 47% of drivers in residential areas didn't comply with newly introduced 20mph limits.

Since 2012, speeding behaviours have remained **mostly unchanged**, with the increase in the percentage of drivers reporting **any speeding behaviours** largely due to the addition of new questions to the survey.



Source: Transport Scotland Road Safety Framework Indicators 2018

In Scotland, 20mph streets are very safe, whereas 30mph limits account for a high proportion of casualties. Even accounting for the greater coverage of 30mph it's clear that 20mph is much safer. In 2017, areas with 20mph limits were the only areas with no deaths recorded.



Source: Scottish Reported Road Casualties 2017: Road User Factsheet

Do you think the reducing the default speed limit on most urban and residential streets would have a positive or negative impact on you or your organisation?

As charities we believe there is a strong public interest in reducing the default speed limit. The members and supporters of organisations such as Living Streets and the Ramblers who walk regularly would benefit from safer streets and reduced risk of injury or death. Streets that feel safer will encourage more people to walk and cycle, further improving population health, and therefore a change to 20mph should be viewed in the context of Scottish Government aspirations for increasing levels of physical activity. Evidence from the pilot phase of 20mph neighbourhoods in Edinburgh saw examples of people changing behaviour to become more active in response to safer streets. Efforts to promote walking to school would be bolstered by a more comprehensive network of urban 20mph limits, extending beyond narrow zones outside school gates.

From an operational stand point it is likely that most organisations would see very marginal changes in overall journey times, especially in congested areas and at peak times.

If the Bill is passed, should its roll-out be accompanied by a national awareness campaign?

A national awareness campaign is vital as a first step in longer-term efforts to change driver behaviour and build public support for this change in culture.

Aside from the small proportion of streets built in the 21st century, most roads have a design speed of 30mph or higher. Most drivers will have passed their test on these roads and will only be accustomed to 20mph in a limited range of circumstances such as dense residential estates, often in traffic calmed zones. Changing behaviour will be challenging and require more than signs and markings. The Scottish government must work with partners to establish the new social norm of driving within 20mph speed limits. The level of change is comparable to the shift in attitudes on drink driving. We believe a concerted education and promotion campaign spanning many years is needed, going well beyond the introductory period.

Research by the University of the West of England indicates that a national level advertising campaign allied with enforcement is needed to maximise the benefits of the change in the national default limit to 20mph through encouraging enhanced levels of compliance. Living Streets' work to promote "Lower Speed Communities" indicates significant research is needed into the individual, social and material factors affecting attitudes to 20mph. For example, drivers may be much more supportive of 20mph in their own area rather than adjacent neighbourhoods they pass through. Traditional 'shock and awe' tactics may not shift public opinion and so a sophisticated approach will be required to effect this change in behaviour and attitude.

Should Police Scotland be required to take additional enforcement action, over and above that used to enforce the current 30mph limit, following the introduction of a 20mph limit on most urban and residential streets in Scotland?

Police Scotland should enforce all speed limits where compliance is low and risks to communities have been identified. That said, some additional pressures on policing are inevitable in relation to:

1. Reinforcing any national publicity campaign with a parallel programme of visible and time limited enforcement when the legislation goes live.
2. Responding to the higher expectations from communities as a result of 20mph being introduced. E.g. bad driver behaviour can appear much worse in a 20mph zone compared to a 30mph zone. Communities will have more awareness of speed issues and be frustrated if non-compliance means the benefits of lower speed limits aren't being secured.
3. Budgeting for the set-up time and costs associated with introducing innovative community led initiatives such as 'speed watch' campaigns. In line with community empowerment principles this may allow local people to take ownership of the problem, but training and support is needed.

It is our experience that mixed messages on the likelihood of additional enforcement as part of the Edinburgh city wide 20mph roll-out were unhelpful. The roll-out of a national campaign should learn from this experience regarding communicating police support for the

20mph limit and their willingness to target locations where compliance is likely to be an issue. The police must commit resources to support the initial months of the new national limit. Thereafter conventional intelligence and risk-based approach to enforcement should be maintained, where the local speed limit is only one factor.

If the Bill is agreed, how long should local authorities be given to complete the roll-out of the new 20mph limit?

Based on the roll-out of 20mph in Edinburgh, we believe three years is a realistic timescale for roll-out. A swifter approach could be counterproductive in terms of planning an orderly rollout in parallel with a national publicity campaign. However, waiting any longer, risks a loss of momentum. It was found that levels of controversy also diminished as each phase was rolled-out over time.

Councillors in Edinburgh approved a new speed limit network on 13 January 2015. This was after many years of research and public consultation showing a high level of public support, which was crucial for demonstrating the public interest in making these changes and giving legitimacy for the new speed limit. The final phase of the 20mph network came into effect on 5 March 2018. We don't believe any local authority has a substantially more complicated roads network than Edinburgh. However, minority of councils have done little to develop the type of residential network established in the capital, prior to the city-wide network. A national default will be particularly beneficial in helping these council areas catch up.

A national default speed limit should create a simpler and cheaper process than that used in Edinburgh. The focus will be on a smaller number of streets and traffic regulations for streets where the 30mph limit is retained. We believe very few communities will want to opt out of 20mph, so the process need not be protracted.

Do you have any comments on the impact that the Bill might have on the following issues?

Human rights

The bill will have a positive impact on human rights. In terms of equalities legislation safer streets are particularly beneficial to people with protected characteristics around age and disability. In addition, approximately 30% of households in Scotland don't have access to a car, a proportion which is higher in our more urban areas, and therefore any measures to improve conditions for walkers, cyclists or those using public transport will particularly benefit those who don't have access to a car.

Sustainable development

20mph, if implemented effectively, should lead to changes in behaviour, e.g. more people walking and cycling because they feel the streets are safer, and that modal shift would reduce emissions. Evidence on carbon reduction and air pollution is mixed and inconclusive, with different sources cited by those supportive and opposed to 20mph. Sign-

only 20mph limits are likely to support smoother and more efficient driving styles than traffic calmed zones.

Island, rural or remote communities

Lower speeds will benefit communities throughout Scotland, including smaller towns and settlements. As these communities suffer from less congestion, the scope to reduce average speeds will often be higher.

Is there anything else that should be included, or removed, from the Bill?

The bill is a simple and elegant piece of legislation, which updates the urban default speed limit to a 21st century standard. The existing 30mph default is, by comparison, a throwback to the 1930s and is being replaced across Europe and in many Scottish council areas, where community safety has been made a priority.

The committee should investigate supporting regulations and guidance on which streets within the network should be retained at 30mph. We believe some councils may take a liberal approach to retaining 30mph due to concerns about negative publicity and outdated attitudes to prioritising traffic flow ahead of the wider needs of communities. Misplaced special pleading by bus companies is one example of where streets could be retained at 30mph. An inconsistent approach would reduce the overall benefits gained from the 20mph limit throughout that urban area.

We reject arguments that slowly rolling out traffic calmed zones is the only way to introducing 20mph into communities. A sign-only approach can still deliver benefits to many streets at a fraction of the cost of engineered zones. However, care will be needed to ensure urban speed limits remain consistent and where possible self-enforcing. We believe certain 'problem streets' would be better treated as traffic calmed zones, especially, if the local characteristics promote traffic speeds substantially higher than 30mph. Lane narrowing, including cycle lanes, and planting can all positively reinforce lower speeds. Average speed cameras could also be effective for some streets. Monitoring and evaluation will be critical, including determining whether additional enforcement and traffic calming measures are required both prior and after any adjustment to 20mph.

On their own 20mph limits aren't a silver bullet for improving public health, safety, social inclusion and the environment, but they are an essential element in an overall approach to delivering safer streets, through education, enforcement and engineering. Many communities already benefit from 20mph streets, where it's safe to live, shop and exercise. The Restricted Roads (20mph Speed Limits) Bill 2018 will ensure other communities aren't excluded from these benefits. Ultimately, a 20mph default will facilitate the faster roll-out and reduced cost of a measure that will reduce injuries and deaths. There are few down sides, and even fewer cost effective options to achieve national road safety goals.

Further information

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¹ Taylor, M. C., Lynam, D. A. and Baruya, A. (2000)